

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<u>SUPERSEDING INDICTMENT</u>
	:	
- v. -	:	S1 21 Cr. 587 (LGS)
	:	
THOMAS PARKER, JR.,	:	
a/k/a "Kilo,"	:	
THOMAS PARKER, SR.,	:	
a/k/a "Bo Black," and	:	
ASHINE MCRAE,	:	
a/k/a "Po,"	:	
a/k/a "Avery,"	:	
	:	
Defendants.	:	
	:	
- - - - -	X	

COUNT ONE
(Narcotics Conspiracy)

The Grand Jury charges:

1. From in or about November 2020 through in or about January 2022, in the Southern District of New York and elsewhere, THOMAS PARKER, JR., a/k/a "Kilo," THOMAS PARKER, SR., a/k/a "Bo Black," and ASHINE MCRAE, a/k/a "Po," a/k/a "Avery," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that THOMAS PARKER, JR., a/k/a "Kilo," THOMAS PARKER, SR., a/k/a "Bo Black,"

and ASHINE MCRAE, a/k/a "Po," a/k/a "Avery," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that THOMAS PARKER, JR., a/k/a "Kilo," THOMAS PARKER, SR., a/k/a "Bo Black," and ASHINE MCRAE, a/k/a "Po," a/k/a "Avery," the defendants, and others known and unknown, conspired to distribute and possess with intent to distribute were: (i) 100 grams and more of mixtures and substances containing a detectable amount of heroin, and (ii) 40 grams and more of mixtures and substances containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as "fentanyl," in violation of Title 21, United States Code, Section 841(b)(1)(B); and a quantity of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Using, Carrying, and Possessing a Firearm During, in Relation to, and in Furtherance of a Drug Trafficking Crime)

The Grand Jury further charges:

4. In or about September 2021, in the Southern District of New York and elsewhere, THOMAS PARKER, JR., a/k/a "Kilo", the defendant, during and in relation to a drug trafficking crime for

which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Superseding Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT THREE

(Using, Carrying, Brandishing, and Discharging a Firearm During, in Relation to, and in Furtherance of a Crime of Violence and a Drug Trafficking Crime)

The Grand Jury further charges:

5. In or about September 2021, in the Southern District of New York and elsewhere, ASHINE MCRAE, a/k/a "Po," a/k/a "Avery," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Superseding Indictment, knowingly did use and carry firearms, and in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), (iii), and 2.)

COUNT FOUR
(Felon in Possession)

The Grand Jury further charges:

6. In or about September 2021, in the Southern District of New York and elsewhere, ASHINE MCRAE, a/k/a "Po," a/k/a "Avery," the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, four rounds of 9 mm Luger ammunition, which were in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 922(g)(1).)

FORFEITURE ALLEGATION

7. As a result of committing the offense alleged in Count One of this Indictment, THOMAS PARKER, JR., a/k/a "Kilo," THOMAS PARKER, SR., a/k/a "Bo Black," and ASHINE MCRAE, a/k/a "Po," a/k/a "Avery," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

8. As a result of committing the offense alleged in Count Four of this Indictment, ASHINE MCRAE, a/k/a "Po," a/k/a "Avery," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offense.

Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the above
forfeitable property.

(Title 21, United States Code, Section 853.)

Brian Carr
FOREPERSON

Damian Williams
DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

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THOMAS PARKER, SR.,
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ASHINE MCRAE,
a/k/a "Po,"
a/k/a "Avery,"

Defendants.

SUPERSEDING INDICTMENT

S1 21 Cr. 587 (LGS)

(21 U.S.C. § 846; 18 U.S.C. §§ 922,
924(c), and 2.)

DAMIAN WILLIAMS
United States Attorney



Foreperson

2/16/22 File SUPERSEDING INDICTMENT

6:00 PM 2/16/22